

Remarks

Examiner Im is thanked for the thorough Office Action.

In the Drawings

Applicants acknowledge the acceptance of the drawings filed on 11 May 2006, i.e. sheet 3/7, Fig. 6.

In the Claims

Independent claims 1, 13 and 25 have each been amended to remove the a), b) and c) limitations. These amendments have broadened these respective claims.

Dependent claims 36, 37 and 38 respectively depend from independent claims 1, 13 and 25. Claims 36 to 37 are new and have been added to better encompass the full scope and breadth of the invention notwithstanding the patentability of the original claims. These new claims include the limitations from their respective independent claims that have been removed from those independent claims.

Claim Rejections

The Rejection Of Claims 1 To 10, 12 To 21, 23 To 33 And 35 Under 35 U.S.C. §103(a) as Being Unpatentable Over Takahashi et al. (U.S. Patent No. 6,765,299) In View Of Yanagida (U.S. Patent No. 6,204,558)

The rejection of claims 1 to 10, 12 to 21, 23 to 33 and 35 under 35 U.S.C. §103(a) as being unpatentable over Takahashi et al. (U.S. Patent No. 6,765,299) (the '299 Takahashi Patent) in view of Yanagida (U.S. Patent No. 6,204,558) (the '558 Yanagida Patent) is acknowledged.

The Rejection Of Claims 11, 22 And 34 Under 35 U.S.C. §103(a) as Being Unpatentable Over Takahashi et al. (U.S. Patent No. 6,765,299) And Yanagida (U.S. Patent No. 6,204,558) As Applied To Claims 1, 13 And 25 Above, And Further In View Of Degani et al. (U.S. Patent No. 6,734,539)

The rejection of claims 11, 22 and 34 under 35 U.S.C. §103(a) as being unpatentable over Takahashi et al. (U.S. Patent No. 6,765,299) (the '299 Takahashi Patent) and Yanagida (U.S. Patent No. 6,204,558) (the '558 Yanagida Patent) as applied to claims 1, 13 and 25 above, and further in view of Degani et al. (U.S. Patent No. 6,734,539) (the '539 Degani Patent) is acknowledged.

The claims are rejected under § 103(a) over the '299 Takahashi Patent and the '558 Yanagida Patent (and further in view of the '539 Degani Patent as to claims 11, 22 and 34). However, according to Section 2142 of the MPEP, "The examiner bears the initial burden of factually supporting any *prima facie* conclusion of obviousness. ... To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure."

Takahashi discloses a multi-chip device which includes a first semiconductor chip 101 and a second semiconductor chip 111. (Please see the Background of the Invention. Col. 1, lines 9 to 11: "In particular, this invention relates to a chip size package, which has a plurality of semiconductor chips") The first semiconductor chip 101 includes conductive posts 106 and the second semiconductor chip 111 includes conductive posts 116. However, the instantly claimed invention discloses and claims a single chip device. Takahashi and the instantly claimed invention are different technologies. There is no suggestion or motivation for one skilled in the art

to combine the Takahashi patent (directed to a multi-chip device) and the '558 Yanagida Patent (epoxy) teachings to complete the claimed invention.

Furthermore, Yanagida discloses a ball solder structure but the Takahashi patent is not a ball solder structure but a multi-chip device as noted above. Thus, there is no suggestion or motivation for one skilled in the art to combine them in the manner suggested by the Examiner.

Also for new dependent claims 36 to 38, for example, neither Takahashi nor Yanagida disclose the limitation of "some of the solder lines are below the top surface of the epoxy layer (...)". Thus the cited prior art references fail to teach or suggest all the claim limitations even in the (arguably improper) combination cited by the Examiner.

Therefore, the claimed invention is in fact non-obvious over the cited references under 35 U.S.C. §103(a).

Thus, independent claims 1, 13 and 25 distinguish over Takahashi in view of Yanagida under §103(a) for the above reasoning and further because, inter alia: the prior art lack a suggestion that Takahashi should be modified in a manner required to meet the claims; and the Examiner has not presented a convincing line of reasoning as to why the claimed subject matter as a whole, including its differences over the prior

art, would have been obvious. A fortiori, claims 11, 22 and 34 distinguish over Takahashi in view of Yanagida as applied to claims 1, 13 and 25 and further in view of Degani under §103(a).

Claims 2 to 10 and 12 depend from independent claim 1; claims 14 to 21, 23 and 24 depend from independent claim 13; and claims 26 to 33 and 35 depend from independent claim 25 and are believed to distinguish over the combination for the reasons previously cited.


Therefore claims 1 to 38 are submitted to be allowable over the cited references and reconsideration and allowance are respectfully solicited.

CONCLUSION

In conclusion, reconsideration and withdrawal of the rejections are respectively requested. Allowance of all claims is requested. Issuance of the application is requested.

It is requested that the Examiner telephone Stephen G. Stanton, Esq. (#35,690) at (610) 296 - 5194 or the undersigned attorney/George Saile, Esq. (#19,572) at (845) 452 - 5863 if the Examiner has any questions or issues that may be resolved to expedite prosecution and place this Application in condition for Allowance.

Respectively submitted,



Stephen B. Ackerman
Reg. No. 37,761